

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE  
EASTERN DIVISION**

**CONSOLIDATED INDUSTRIES, LLC  
d/b/a WEATHER KING PORTABLE  
BUILDINGS,**

**Plaintiff,**

**V.**

**JESSE A. MAUPIN, BARRY D.  
HARRELL, ADRIAN S. HARROD,  
LOGAN C. FEAGIN, STEPHANIE L.  
GILLESPIE, RYAN E. BROWN, DANIEL  
J. HERSHBERGER, BRIAN L. LASSEN,  
ALEYNA LASSEN, and AMERICAN  
BARN CO., LLC,**

## Defendants.

**Civil Action No. 1:22-cv-01230-STA-jay**

**Chief Judge S. Thomas Anderson**

**PLAINTIFF’S RENEWED MOTION FOR SANCTIONS AGAINST DEFENDANTS**  
**GILLESPIE, BROWN AND HERSHBERGER**

Pursuant to Fed. R. Civ. P. 37(b)(2)(A), Plaintiff renews its motion for sanctions against Defendants Stephanie L. Gillespie, Ryan E. Brown, and Daniel J. Hershberger. As grounds for this motion, Plaintiff submits that these Defendants have failed to comply with the Court's August 29, 2023 Order (ECF No. 111) and have withheld responsive documents and committed other discovery abuses. Due to the egregiousness of Defendants' actions, the Court should enter default judgment against them in addition to monetary sanctions. In support of this motion, Plaintiff has filed a memorandum of law herewith and relies on the following exhibits:

1. The July 22, 2025 Declaration of David L. Johnson, filed herewith as Exhibit A;

2. Excerpts of the May 20, 2025 Deposition of Defendant Stephanie Gillespie (together with Exhibits 4, 9-14, 17-19, 21-28, 31, 34, 36-37, 38 (without attachment), 39, 41, 45, 47, 58 and 59 thereto), collectively filed herewith as Exhibit B;

3. Excerpts of the May 15, 2025 Deposition of Ryan Brown (together with Exhibits 2, 5, 7, 8, 11-14, 17, and 18 thereto), collectively filed herewith as Exhibit C; and

4. Excerpts of the May 15, 2025 Deposition of Daniel Hershberger (together with Exhibits 2, 3, 8-13, 15-17, 19-20, and 23-31 thereto), collectively filed herewith as Exhibit D.

Respectfully submitted,

/s/ David L. Johnson

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*Attorneys for Plaintiff*

**CERTIFICATE OF COUNSEL**

In accordance with Local Rule 7.2(a)(1)(B), I certify that I conferred with Attorneys Thomas Pasternak and Benjamin Morrell via email on July 8, 2025, and that the motion is opposed due to lack of agreement.

/s/ David L. Johnson  
David L. Johnson

**CERTIFICATE OF SERVICE**

I hereby certify that on July 22, 2025, I filed the foregoing Notice with the Court using the ECF system, which will provide notice and a copy to counsel of record:

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And to the following via U.S. Mail and email.

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/s/ David L. Johnson  
David L. Johnson